

EXHIBIT A

Manuel J. Rios, Jr.

From: Steinmetz, Kyle J. <KSteinmetz@mayerbrown.com>
Sent: Tuesday, April 20, 2021 6:07 PM
To: John W. Barrett; Manuel J. Rios, Jr.; Germann, Hans; Parasharami, Archis A.; Jones, Daniel E.; 'dwaltz@jacksonkelly.com'; 'sarah.a.phipps@jacksonkelly.com'
Cc: Benjamin J. Hogan; William S. Flynn; 'Anthony Paronich'; Ted Broderick; Matthew McCue; Katherine E. Charonko
Subject: RE: Diana Mey, et al v. DirecTV - Case No. 5:17-CV-00179-JPB
Attachments: Mey search terms.pdf

CAUTION: External Email

Counsel:

Attached please find DIRECTV's proposed search terms for the Mey ESI search. As previously discussed, we have run this search on two of the proposed custodians (Jim Henschel and Steve Shapiro). The terms generated 7,008 hits. That number does not account for de-duplication, or any review or filter for responsiveness or privilege. We look forward to discussing on our call later this week.

Regards,

Kyle

From: John W. Barrett <JBarrett@baileyglasser.com>
Sent: Monday, April 5, 2021 12:24 PM
To: Steinmetz, Kyle J. <KSteinmetz@mayerbrown.com>; Manuel J. Rios, Jr. <mrios@baileyglasser.com>; Germann, Hans <HGermann@mayerbrown.com>; Parasharami, Archis A. <AParasharami@mayerbrown.com>; Jones, Daniel E. <DJones@mayerbrown.com>; 'dwaltz@jacksonkelly.com' <dwaltz@jacksonkelly.com>; 'sarah.a.phipps@jacksonkelly.com' <sarah.a.phipps@jacksonkelly.com>
Cc: Benjamin J. Hogan <bhogan@baileyglasser.com>; William S. Flynn <wflynn@baileyglasser.com>; 'Anthony Paronich' <anthony@paronichlaw.com>; Ted Broderick <Ted@broderick-law.com>; Matthew McCue <mmccue@massattorneys.net>; Katherine E. Charonko <kcharonko@baileyglasser.com>
Subject: RE: Diana Mey, et al v. DirecTV - Case No. 5:17-CV-00179-JPB

****EXTERNAL SENDER****

Kyle, thanks for the letter. We are reviewing it and will respond. In the meantime, can we meet this Thursday at 4 eastern to meet and confer on search terms and the other matters stated in your letter? If yes, I can circulate a number and invite. Thanks.